

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VALTRUS INNOVATIONS LTD.,  Plaintiff, v.  AT&T INC., et al.,  Defendants.	Case No. 2:23-CV-00443-JRG (LEAD CASE)  <b>JURY TRIAL DEMANDED</b>
VALTRUS INNOVATIONS LTD.,  Plaintiff, v.  VERIZON COMMUNICATIONS, INC., et al,  Defendants.	Case No. 2:23-cv-00445-JRG (MEMBER CASE)  <b>JURY TRIAL DEMANDED</b>
VALTRUS INNOVATIONS LTD.,  Plaintiff, v.  T-MOBILE USA, INC., T-MOBILE US, INC., SPRINT CORP., ONEPLUS TECHNOLOGY (SHENZEN) CO., LTD. AND ONEPLUS MOBILE COMMUNICATIONS (GUANGDONG) CO., LTD.  Defendants.	Case No. 2:23-CV-00444-JRG (MEMBER CASE)  <b>JURY TRIAL DEMANDED</b>

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
RESPONSE TO PLAINTIFF’S OPPOSED MOTION FOR LEAVE  
TO AMEND THE COMPLAINT TO ASSERT U.S. PATENT NO. 7,769,050**

Defendants Verizon Communications Inc., and Cellco Partnership d/b/a Verizon Wireless (collectively, “Verizon”); Defendants T-Mobile USA, Inc., T-Mobile US, Inc.<sup>1</sup>, and Sprint Corp.<sup>2</sup>

<sup>1</sup> T-Mobile US, Inc. is a holding company that does not provide any products, services, or networks. As such, T-Mobile Defendants deny that T-Mobile US, Inc. is properly named as a party to this lawsuit.

<sup>2</sup> Sprint Corp. is now known as Sprint LLC. Sprint LLC is a wholly owned, direct subsidiary of T-Mobile USA, Inc. and is a holding company that does not provide any products, services, or

(collectively, “T-Mobile”); and OnePlus Technology (Shenzen) Co., Ltd. and OnePlus Mobile Communications (Guangdong) Co., Ltd., (collectively, “OnePlus”) (all defendants collectively, “Defendants”) respectfully file this Unopposed Motion for Extension of Time to File Response to Plaintiff’s Opposed Motion for Leave to Amend the Complaint to Assert U.S. Patent No. 7,769,050 (“Motion for Extension”) and would show the Court as follows:

On April 3, 2024, Plaintiff Valtrus Innovations Ltd. (“Valtrus”) filed its Opposed Motion for Leave to Amend the Complaint to Assert U.S. Patent No. 7,769,050 (“Motion to Amend”) (Dkt. 72). Defendants’ deadline to file their response to the Motion to Amend is April 17, 2024. *See* Local Rule CV-7(e). At this time, Defendants request a brief one-week extension of time to file their response to Valtrus’ Motion to Amend. *See id.* (“Any party may separately move for an order of this court lengthening ... the response period.”).

Defendants represent that this extension is not sought for the purposes of delay but rather so that justice may be served. Counsel for Defendants met and conferred with counsel for Valtrus, and counsel for Valtrus indicated that Valtrus is unopposed to the relief sought in this Motion for Extension.

Accordingly, Defendants respectfully request that this Court grant this Unopposed Motion and enter an order extending the deadline for Defendants to file their response to Valtrus’ Motion to Amend up to and including April 24, 2024.

Dated: April 16, 2024

Respectfully submitted,

*/s/ Melissa R. Smith*

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networks. As such, T-Mobile Defendants deny that Sprint LLC is properly named as a party to this lawsuit.

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Communications (Guangdong) Co., Ltd.*

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Defendants met and conferred with counsel for Valtrus to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(h). Counsel for Valtrus indicated that Valtrus is unopposed to the relief sought in this Motion for Extension.

*/s/ Melissa R. Smith*

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Melissa R. Smith

**CERTIFICATE OF SERVICE**

I hereby certify that, on April 16, 2024, the foregoing document was filed electronically in compliance with Local Rule CV-5(a), which will provide notice of the same to all counsel of record.

*/s/ Melissa R. Smith*

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Melissa R. Smith